

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 1597.05
REPORTING AND RECORDKEEPING REQUIREMENTS FOR THE
PROPOSED RULE ON
MERCURY-CONTAINING EQUIPMENT
REUSE AND RECYCLING**

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

Background

1(a) Title and Number of Information Collection

This Information Collection Request (ICR) is entitled "Reporting and Recordkeeping Requirements for the Proposed Rule on Mercury-Containing Equipment Reuse and Recycling", ICR Number 1597.05

1(b) Characterization of the Information Collection

Section 3001 of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, requires the Environmental Protection Agency (EPA) to identify which solid wastes are hazardous wastes and therefore must be managed as hazardous waste during treatment, storage, or disposal. Under this authority, EPA established four hazardous waste characteristics (toxicity, reactivity, ignitability, and corrosivity), and listed specific wastes that must be managed as hazardous wastes. Waste mercury-containing equipment (MCE) are often hazardous because they exhibit the characteristic of toxicity by exceeding the regulatory level for mercury. As a result, currently most waste MCE are subject to strict controls under RCRA Subtitle C hazardous waste regulations.

After consideration of the issues, EPA added hazardous waste MCE to the existing universal waste regulations at 40 CFR Part 273. The existing universal waste regulations, published on May 11, 1995, provide streamlined procedures for certain widely generated wastes identified as universal wastes (60 FR 25492). The universal waste standards are designed to accomplish the following general goals:

- Encourage resource conservation while ensuring protection of human health and the environment;
- Improve implementation of the Subtitle C hazardous waste program through a simplified set of requirements that are easily understood by handlers of MCE waste; and
- Separate universal waste from the municipal waste stream by encouraging individuals and organizations to collect these wastes and to manage them in an appropriate hazardous waste management system.

The final universal waste MCE rule requires generators of this equipment to follow procedures for maintaining the condition of the MCE (e.g., proper packaging), storing MCE (e.g., accumulation time limits, labeling), notifying EPA as specified, and responding to releases. The universal waste standards establish management standards for two types of MCE generators: small quantity handlers (SQHUWs) and large quantity handlers (LQHUWs) of MCE wastes. SQHUWs are universal waste handlers who do not accumulate more than 5,000 kilograms total of universal waste at any one time. LQHUWs are universal waste handlers that accumulate 5,000

kilograms or more total of universal waste at any time. Destination sites receiving waste MCE are subject to the RCRA hazardous waste regulations at 40 CFR Parts 264-270 and 124, as applicable.

This ICR is a comprehensive description of the information collection requirements for handlers of hazardous waste MCE under the universal waste requirements.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

The requirements covered in this ICR are necessary for EPA to obtain general information on universal waste MCE regulated entities and to facilitate enforcement of Part 273 regulations. The notification requirements are needed to assist the Agency in identifying and tracking large quantity handlers of universal waste MCE. EPA requires large quantity handlers to mark and track MCE shipments to help ensure that universal waste MCE are being accumulated responsibly. EPA requires tracking of universal waste MCE shipments to help ensure that universal waste MCE is being properly treated, recycled, or disposed.

2(b) Use and Users of the Data

EPA will use the collected information to ensure that universal waste MCE are being managed in a protective manner. This information aids the Agency in tracking universal waste MCE shipments and identifying improper management practices. In addition, information kept in facility records will help handlers demonstrate, and on-site inspectors ensure, that facilities are managing MCE properly. Information marked on MCE or MCE containers will assist handlers, and transporters in ensuring proper management during storage and shipment.

3. RESPONDENTS AND THE INFORMATION REQUESTED

3(a) Respondents and SIC Codes

The following is a list of Standard Industrial Classification (SIC) codes associated with entities handling MCE likely to be affected by the information collection requirements covered under this ICR:

SIC Code*	Industry*
	AGRICULTURE
7	Agricultural services
	CONSTRUCTION
15	General contractors
17	Special trade contractors

SIC Code*	Industry*
	MANUFACTURING
20	Food & kindred products
34	Fabricated metal products
35	Industrial machinery & equipment
36	Electronic & other electronic equipment
37	Transportation equipment
38	Instrument & related products
	PUBLIC UTILITIES
49	Electronic, gas, & sanitary services
	WHOLESALE TRADE
50	Wholesale trade-durable goods
	RETAIL TRADE
58	Eating & drinking places
	SERVICES
72	Personal services
73	Business services
75	Auto repair, services, & parking
76	Misc. repair services
80	Health services
82	Educational services

* Source: U.S. Bureau of the Census (1997).

3(b) Information Requested

This section describes information collection requirements applicable to universal waste MCE regulated entities that would be affected by the proposed rule.

Notification

(i) Data items:

The proposed rule requires large quantity handlers to send written notification of universal waste MCE management to the Regional Administrator, and receive an EPA identification number. Specifically, large quantity handlers must send written notification before meeting or exceeding the 5,000 kilogram accumulation limit of universal waste. Large quantity handlers who have already notified EPA of their hazardous waste management activities under RCRA or

pesticide management under FIFRA and have received an EPA Identification number are not required to renotify.

The notification must include the following data items:

- The universal waste handler's name and mailing address;
- The name and business telephone number of the person at the universal waste handler's site who should be contacted regarding universal waste management activities;
- The address or physical location of the universal waste management activities;
- A list of all types of universal waste managed by the handler; and
- A statement indicating that the handler is accumulating 5,000 kilograms or more of universal waste at one time and a description of the types of waste accumulated.

(ii) Respondent activities:

- Large quantity handlers must prepare and submit written notification of universal waste MCE management to the Regional Administrator.

Marking

(i) Data items:

Small and large quantity handlers are required to mark or label their universal waste MCE materials in accordance with the following procedures:

- Mercury-containing equipment or containers must be marked or labeled with the words: "Universal Waste-Mercury-Containing Equipment" or "Waste-Mercury-Containing Equipment" or "Used Mercury-Containing Equipment".

(ii) Respondent Activities:

- Handlers must mark or label the universal waste MCE or the containers holding universal waste MCE.

Accumulation Time Limits

(i) Data items:

Small quantity handlers and large quantity handlers are required to demonstrate the length of time that the MCE has been accumulated from the date it was received or became a waste. The demonstration may be made by using any of the following methods:

- Placing the universal waste MCE in a container and marking or labeling the container with the earliest date that any MCE in the container became a waste or was received.
- Marking or labeling each individual item of universal waste MCE with the date it became a waste or was received.
- Maintaining an inventory system on site that identifies the date the MCE being accumulated became wastes or were received.
- Maintaining an inventory system on site that identifies the earliest date any MCE in a group of MCE items or a group of containers of MCE became a waste or was received.
- Placing the MCE in a specific accumulation area and identifying the earliest date that any MCE in the area became a waste or was received.
- Any other method which clearly demonstrates the length of time that the MCE has been accumulated from the date it became a waste or was received.

(ii) Respondent Activities:

- Handlers must demonstrate the length of time that MCE has been accumulated since it became a waste or was received.

Tracking MCE Shipments

(i) Data items:

The proposed rule requires large quantity handlers to keep records of each incoming or outgoing universal waste MCE shipment. Records of shipments must be kept for a period of three years from the day of receipt or the day the shipment left the facility.

The data items required are:

- Records of incoming and outgoing shipments must contain the following information:

- ▶ Name and address of the originating or destination facility;
- ▶ Quantity of universal waste MCE received or sent; and
- ▶ Date the shipment was sent or received.

(ii) Respondent activities:

- Large quantity handlers must:
- ▶ Maintain records of all shipments for a period of three years.

Exports

(i) Data Items:

Under the proposed rule, shipments of MCE to a foreign destination must comply with the same requirements as shipments of hazardous waste (i.e., 40 CFR 262, Subparts E or H). These reporting and recordkeeping activities are not evaluated in this ICR because they already are addressed in the "Requirements for Generators, Transporters, and Waste Management Facilities under the RCRA Hazardous Waste Manifest System" (ICR No. 801) and in the "Exports from and Imports to the U.S. under the Organization for Economic Cooperation and Development (OECD) Decision" (ICR No. 1647).

4. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

The following section discusses how EPA and implementing agencies would collect and manage the information received from respondents. This section also includes a discussion of how EPA would take steps to ensure that the information collections are not overly burdensome on small entities.

4(a) Agency Activities

Most of the information that is required of universal waste MCE handlers would be kept on site and not be submitted to EPA formally. The Agency will conduct the following activities in response to information submittals:

- Review and file notification of universal waste MCE management provided by large quantity handlers;
- Send an EPA identification number to large quantity handlers; and

- Enter notification information into a database.

4(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use electronic equipment such as personal computers and applicable database software. EPA will ensure the accuracy and completeness of the collected information by reviewing each submittal. EPA then would enter the information into a database and aggregate data to monitor universal waste MCE program.

4(c) Small Entity Flexibility

By adding hazardous waste MCE intended for recycling into the federal list of universal waste, the proposed rule will provide regulatory relief from the full Subtitle C management requirement for all entities involved in MCE management and willing to recycle MCE. These entities include generators, transporters, and MCE recycling facilities. Small quantity generators of hazardous waste MCE will become small quantity handlers of universal waste MCE. The regulatory requirements associated with small quantity handlers of universal waste are considerably simpler than those applicable to small quantity generators of hazardous waste.

Further, EPA relieved small quantity handlers from several administrative requirements applicable to large quantity handlers. For example, the proposed rule does not require small quantity handlers to submit notifications of universal waste MCE management or to obtain an EPA identification number. EPA also does not require small quantity handlers to keep records of their universal waste MCE shipments. EPA believes these exemptions would encourage small businesses to safely manage universal waste MCE in compliance with the proposed rule. In addition, EPA allows conditionally exempt small quantity generators (CESQGs) to manage their hazardous waste MCE either under the specific provisions of the proposed rule or under the existing CESQG exemption in 40 CFR 261.5.

Finally, the universal waste MCE rule is a regulatory relief initiative that should reduce regulatory burden and costs for all universal waste handlers, but should particularly benefit small entities.

4(d) Collection Schedule

EPA does not collect any information on a regular schedule, except for annual notification schedule for exports of MCE to non-OECD countries and annual report of exports of MCE to OECD countries.

5. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

5(a) Non-duplication

The streamlined MCE requirements minimize the paperwork activities respondents must undertake in relation to the full hazardous waste program, and enable them to follow standard industry practices and other Federal agency requirements, where appropriate, to satisfy the universal waste MCE requirements. The information required by the proposed regulations covered by this ICR is not available from any source but the respondents.

5(b) Effects of Less Frequent Collection

EPA will consider carefully the burden imposed upon the regulated community by the proposed regulations, and to the extent possible, will attempt to minimize the burden imposed. EPA believes strongly that if the minimum requirements specified under the proposed regulations are not met, neither the facilities nor EPA will be able to ensure that waste MCE are being managed in a manner protective of human health and the environment.

5(c) General Guidelines

This ICR adheres to the guidelines stated in the 1995 Paperwork Reduction Act, OMB's implementing regulations, OMB's Information Collection Review Handbook, and other applicable OMB guidance.

5(d) Confidentiality

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which define EPA's general policy on public disclosure of information, contain provisions for confidentiality. The information provided by the entities regulated under the proposed regulations will be treated in accordance with these provisions, as appropriate.

5(e) Sensitive Questions

No questions of a sensitive nature are included in any of the information collection requirements.

6. ESTIMATING THE BURDEN AND COST OF COLLECTION

6(a) Number of Respondents

The number of facilities that would be covered by the proposed rule was obtained from EPA's "Draft Economic Analysis of Including Mercury-Containing Devices (MCD) in the Universal Waste System, Notice of Proposed Rulemaking" dated September 5, 2001. The report estimated that there would be 1,864 small quantity handlers, 13 large quantity handlers, 18 TSDFs, and 600 transporters. For the purpose of evaluating the annual costs associated with new facilities, the Agency also estimates that one percent of the facilities are new facilities.

6(b) Estimating Respondent Burden

This ICR presents a comprehensive characterization of the reporting and recordkeeping burden and costs to universal waste MCE handlers, TSDFs and transporters under the proposed rule. Except for manifest requirements, recyclers of universal waste (destination facilities/TSDFs) must comply with the same requirements that apply to recyclers of hazardous wastes.

Reading the Regulations

EPA expects that regulated universal waste MCE entities will read the applicable universal waste MCE regulations as a one-time activity in order to familiarize themselves with the new rule.

Notification

All large quantity handlers would be required to send EPA a written notification of universal waste MCE management under the proposed rule. EPA expects that one percent of the generators are new facilities.

Marking

EPA expects that all handlers will mark or label universal waste MCE or containers holding universal waste MCE. Handlers are expected to mark containers rather than individual MCE, thus minimizing the recordkeeping burden.

Accumulation Time Limits

EPA expects that some MCE entities will keep records on their storage time limits according to procedures specified on the regulations. EPA believes the remaining entities will use standard business practices.

Tracking MCE Shipments

Table 1 provides background data on the number of universal waste MCE entities and shipments. Table 2 shows the one time cost for rule familiarization and notification of hazardous waste activity and the average annual burden and costs for handlers, TSDFs, and transporters to comply with each MCE requirement. The table includes estimated labor costs and operation and maintenance (O&M) costs. Table 3 summarizes, by respondent type, the total annual burden and costs. Table 3 also includes capital costs for respondents (i.e., file cabinets).

Table 1
Estimated Number of MCE Shipments

Type of Regulated Entity	Number of Regulated Entities	Total # of Shipments Sent Off Site/Year	# of Shipments Received/Year
Small Quantity Handlers	1,864	1,864	0
Large Quantity Handlers	13	13	0
TSDFs	18	0	1,877
Transporters	600	0	1,877
Total	2,495	3,000	1,877

**TABLE 2
REPORTING AND RECORDKEEPING REQUIREMENTS
FOR UNIVERSAL WASTE MCE REGULATED ENTITIES:
ONE TIME COST PER FACILITY**

						O&M Costs per Respondent					
	Number of Respondents	Hours per Respondent				Postage/ Shipping @ \$3/doc	Photocopies @ \$0.10/page	Contractor Support @\$88.05/hr	Hours per Respondent	Cost per Respondent	Total Cost All Respondents
		Legal @\$116.53/hr	Manager @\$110.95/hr	Technical @\$60.89/hr	Clerical @\$43.44/hr						
Rule Familiarization											
Small Quantity Handlers	1,864	0.0	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	2.5	\$202.28	\$377,049.92
Large Quantity Handlers	13	0.5	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	3	\$260.55	\$3,387.15
TSDFs	18	0.5	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	2.5	\$260.55	\$4,689.90
Transporters	600	0.5	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	3	\$260.55	\$156,330.00
SUBTOTAL	2,495	1.5	4.0	6.0	0.0	\$0.00	\$0.00	\$0.00	11	\$983.93	\$541,456.97
Prepare and submit written notification of MCE management											
Large Quantity Handlers	13	0.0	0.5	1.0	0.5	\$3.00	\$1.00	\$0.00	2	\$145.09	\$1,886.17
TOTAL ONE TIME COST PER ENTITY											
Small Quantity Handlers	1,864	0.0	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	2.5	\$202.28	\$377,049.92
Large Quantity Handlers	13	0.5	1.5	2.5	0.0	\$3.00	\$1.00	\$0.00	4.5	\$402.64	\$5,234.32
TSDFS	18	0.5	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	2.5	\$260.55	\$4,689.90
Transporters	600	0.5	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	3	\$260.55	\$156,330.00
TOTALS	2,495	1.5	4.5	7.0	0.0	\$3.00	\$1.00	\$0.00	12.5	\$1,126.02	\$543,304.14

**REPORTING AND RECORDKEEPING REQUIREMENTS
FOR UNIVERSAL WASTE MCE REGULATED ENTITIES:
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

						O&M Costs per Respondent					
	Number of Respondents	Hours per Respondent				Postage/ Shipping @ \$3/doc	Photocopies @ \$0.10/page	Contractor Support @\$88.05/hr	Hours per Year per Respondent	Cost per Year per Respondent	Total Cost per Year All Respondents
		Legal @\$116.53/hr	Manager @\$110.95/hr	Technical @\$60.89/hr	Clerical @\$43.44/hr						

LABELING AND MARKING

Mark the MCE or MCE containers

Small Quantity Handlers	1,864	0.0	0.0	1.0	0.5	\$0.00	\$0.00	\$0.00	1.5	\$82.61	\$153,985.04
Large Quantity Handlers	13	0.0	0.0	1.0	1.0	\$0.00	\$0.00	\$0.00	2	\$104.33	\$1,356.29
TSDFs	18	0.0	0.0	2.0	0.0	\$0.00	\$0.00	\$0.00	2	\$121.78	\$2,192.04
SUBTOTAL	1,895	0.0	0.0	4.0	1.5	\$0.00	\$0.00	\$0.00	5.5	\$308.72	\$157,533.37

STORAGE TIME LIMITS

Mark MCE or MCE containers with the date the waste was received or became a waste

Small Quantity Handlers	1,864	0.0	0.0	0.5	0.5	\$0.00	\$0.00	\$0.00	1	\$52.17	\$97,244.88
Large Quantity Handlers	13	0.0	0.0	1.0	0.5	\$0.00	\$0.00	\$0.00	1.5	\$82.61	\$1,073.93
Subtotal	1,877	0.0	0.0	1.5	1.0	\$0.0	\$0.00	\$0.00	2.5	\$134.78	\$98,318.81

TRACKING MCE SHIPMENTS

Keep a record of each shipment of MCE

Large Quantity Handlers	13	0.0	0.0	0.5	0.0	\$0.00	\$1.80	\$0.00	0.5	\$32.25	\$419.25
TSDFs	18	0.0	0.0	15.0	10.0	\$0.00	\$5.00	\$0.00	25	\$1,352.75	\$24,349.50
SUBTOTAL	31	0.0	0.0	15.5	10.0	\$0.00	\$6.80	\$0.00	25.5	\$1,385.00	\$24,768.75

**REPORTING AND RECORDKEEPING REQUIREMENTS
FOR UNIVERSAL WASTE MCE REGULATED ENTITIES:
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST**

						O&M Costs per Respondent					
	Number of Respondents	Hours per Respondent				Postage/ Shipping @ \$3/doc	Photocopies @ \$0.10/page	Contractor Support @\$88.05/hr	Hours per Year per Respondent	Cost per Year per Respondent	Total Cost per Year All Respondents
		Legal @\$116.53/hr	Manager @\$110.95/hr	Technical @\$60.89/hr	Clerical @\$43.44/hr						
Small Quantity Handler Total	1,864	0.0	0.0	1.5	1.0	\$0.00	\$0.00	\$0.00	2.5	\$134.78	\$251,229.92
Large Quantity Handler Total	13	0.0	0.0	2.5	1.5	\$0.00	\$1.80	\$0.00	4	\$219.19	\$2,849.47
TSDF Total	18	0.0	0.0	17.0	10.0	\$0.00	\$5.00	\$0.00	27	\$1,479.53	\$26,631.54
TOTAL	1,895	0.0	0.0	21.0	12.5	\$0.00	\$6.80	\$0.00	33.5	\$1,833.50	\$280,710.93

6(c) Estimating Respondent Costs

Labor

The average annual salaries of the professionals listed in Table 2 are based on data found in the U.S. Department of Labor Statistics (BLS) “National Compensation Survey: Occupational Wages in the United States, 1997.” Wages were calculated using the BLS rate with the labor multiplier. The labor rates are based on a full-time employee with a 40-hour work week. Total one-time costs are estimated to be \$543,304 from Table 2 and the annual respondent labor costs summarized in t Table 3 are estimated to be \$280,615.

Operation and Maintenance

O&M costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the 1995 Paperwork Reduction Act as “the recurring dollar amount of cost associated with O&M or purchasing services.” For this ICR, O&M costs cover postage and for reports sent to other parties (\$3 per package) and photocopying (\$0.10 per page). In addition, O&M costs include contractor costs (i.e., costs charged by firms acting as agents for their customers). Total annual respondent O&M costs, summarized in the 5th column of Table 3, are estimated to be \$113.

Capital

In the following paragraphs, EPA estimates capital costs associated with the information requirements covered by this ICR. Capital costs usually include any produced physical good needed to provide or keep records of the needed information, such as machinery, computers, and other equipment. For this ICR, the only required capital is file cabinets for maintaining reports. The file cabinet costs are based on the assumption that large quantity handlers would need to buy approximately one cabinet every five years and TSDFs and transporters would not need any additional file storage capacity. EPA estimates that the purchasing price for one file cabinet is \$550, including delivery. Total annual respondent capital costs, summarized in the 4th column of Table 3, are estimated to be \$1,430.

6(d) Estimating Agency Burden and Cost

Table 4 estimates EPA's annual burden hours and costs associated with the requirements covered in this ICR. Since Regional Offices generally would process all the information collected under the requirements covered in this ICR, Regional labor costs are used in the calculation of Federal Agency costs. EPA estimates an average Regional labor cost of \$60 per hour for legal staff, \$43 per hour for managerial staff, \$30 per hour for technical staff, and \$18 per hour for clerical staff. To derive these estimates, EPA used the U.S. Office of Personnel Management 2000 Federal Pay Schedule salary figures to estimate the annual compensation of these staff. EPA estimates an annual Agency burden of 29.2hours, at an annual cost of \$832. For the purposes of this ICR, EPA assigned Regional staff the following government service levels:

- Legal staff GS-15, Step 1 (\$77,614 per year, or \$60 per hour)
- Managerial staff GS-13, Step 1 (\$55,837 per year, or \$43 per hour)
- Technical staff GS-11, Step 1 (\$39,178 per year, or \$30 per hour)
- Clerical staff GS-06, Step 1 (\$23,820 per year, or \$18 per hour)

To derive hourly estimates, EPA divided annual compensation estimates by 2,080, the number of hours in a Federal work year. EPA then multiplied the rates by the standard government overhead factor of 1.6.

6(e) Bottom Line Burden Hours and Costs

The bottom line burden to respondents over the three-year period covered by this ICR is estimated at 15,694 hours with a cost of approximately \$924,012. The bottom-line burden for the Agency is 87.6 hours, with a cost of \$2,496. EPA expects, however, that the regulatory relief resulting from the proposed regulations will lead to a net decrease in the overall respondent burden (see Section 6(f) below).

TABLE 3					
REPORTING AND RECORDKEEPING REQUIREMENTS FOR UNIVERSAL WASTE MCE HANDLERS, TSDFs and TRANSPORTERS:					
ANNUAL RESPONDENT BURDEN AND COST SUMMARY (ALL RESPONDENTS)					
Respondent Type	Total Hours	Labor Costs	Capital Costs	O&M Costs	Total Costs
Small quantity handlers	4,660	\$251,230	\$0	\$0	\$251,230
Large quantity handlers	52	\$2,826	\$1,430	\$23	\$4,279
TSDFs	486	\$26,560	\$0	\$90	\$26,650
TOTAL	5,198	\$280,615	\$1,430	\$113	\$282,158

TABLE 4										
REPORTING AND RECORDKEEPING REQUIREMENTS FOR UNIVERSAL WASTE MCE REGULATED ENTITIES:										
ANNUAL ESTIMATED AGENCY BURDEN AND COST										
	Number of Respondents	Review Hours per Respondent				O&M Review Costs per Respondent		Review Hours per Year All Respondents	Review Cost per Year per Respondent	Total Review Cost per Year All Respondents
		Legal @ \$60/hr	Managerial @ \$43/hr	Technical @ \$30/hr	Clerical @ \$18/hr	Postage/ Shipping @ \$3/doc	Photocopies @ \$0.10/page			
NOTIFICATION										
Review notification for completeness and accuracy										
Large Quantity Handlers	13.0	0.0	0.5	0.5	0.0	\$0.00	\$0.00	13.0	\$36.5	\$474.5
Issue EPA ID number to regulated entities										
Large Quantity Handlers	13.0	0.0	0.0	0.3	0.0	\$3.00	\$1.00	5.4	\$11.5	\$201.5
Enter information into database										
Large Quantity Handlers	13.0	0.0	0.0	0.3	0.3	\$0.00	\$0.00	10.8	\$12.0	\$156.0
TOTAL		0.0	0.5	1.1	0.3	\$3.00	\$1.00	29.2	\$60.0	\$832.0

6(f) Reasons for Change in Burden

EPA expects that the proposed rule will result in a reduction in burden to the regulated waste MCE community. Universal waste MCE entities no longer would be subject to full Subtitle C requirements. Following is a list of primary RCRA reporting and recordkeeping requirements that MCE entities may be relieved of:

- Reporting waste generation data for the EPA's Biennial Report, as covered in ICR No. 976, Biennial Report ICR;
- Reporting and recordkeeping under the land disposal restrictions (LDRs) program of 40 CFR Part 268, as covered in ICR No. 1442, Land Disposal Restrictions ICR;
- Reporting and recordkeeping under the hazardous waste manifest requirements, as covered in ICR No. 801, Manifest ICR; and
- Recordkeeping and/or reporting of personnel training, contingency plan, and emergency procedures under the generator standards of 40 CFR Part 262, as covered in ICR No. 820, Hazardous Waste Generator Standards ICR.

Table 5 presents the average and the total avoided respondent burden resulting from the proposed rule. This avoided burden is based on the average annual burden per respondent as estimated in the ICRs listed above. Table 5 also presents the total estimated avoided entity burden by multiplying the average avoided burden per respondent by the total number of MCE entities expected to be affected by the proposed rule.

Table 5
Average and Total Annual Avoided Respondent Burden (Hours)

Primary RCRA Requirements No Longer Applicable to MCE Regulated Entities	Average Annual Respondent Burden Savings per Regulated Entity (in hours)			
	Small Quantity Handler	Large Quantity Handler	TSDF	Transporter
Prepare and submit Hazardous Waste Biennial Report Forms	N/A	12 (RP)	0	N/A
Prepare and transmit LDR notifications to treatment and disposal facilities and keep records	2 (RP)	2 (RP)	N/A	N/A
	1 (RK)	1 (RK)	N/A	
Prepare and transmit manifests and keep records	1 (RP)	2 (RP)	8 (RP)	12 (RP)
	0.5 (RK)	1 (RK)	2 (RK)	3 (RK)
Personnel training	0.5 (RK)	4 (RK)	0	1(RK)
Contingency plan	N/A	3 (RK)	0	N/A
Emergency procedures	0	0	0	0
Total Avoided Burden per Regulated Entity	3 (RP)	16 (RP)	8 (RP)	12 (RP)
	1.5 (RK)	9 (RK)	2 (RK)	4 (RK)
Number of Regulated Entities Affected by the Proposed Rule	1,864	13	18	600
Total Avoided Burden	5,592 (RP)	208 (RP)	144 (RP)	7,200 (RP)
	2,796 (RK)	117 (RK)	36 (RK)	2,400 (RK)

RP: Reporting; RK: Recordkeeping

6(g) Burden Statement

Table 6 presents the estimated average burden hours per respondent per year for the reporting and recordkeeping requirements covered by this ICR. The reporting burden includes time to comply with the proposed notification, environmental justice, and exporting requirements. The recordkeeping burden includes time to read and understand the regulations, and to follow the proposed labeling/marketing, storage time limits, and shipment tracking requirements.

Table 6
Estimated Annual Burden per MCE Respondent (Hours)

Type of regulate Entity	Estimated Annual Reporting Burden	Estimated Annual Recordkeeping Burden	Estimated Number of Each Entity	Estimated Total Burden
Small Quantity	3	1.5	1,864	8,388
Large Quantity	9	16	13	325
TSDFs	8	2	18	180
Transporters	12	4	600	9600

As shown in Table 6, the total annual burden is estimated to be 4.5 hours for small quantity handlers, 25 hours for large quantity handlers, 10 hours for TSDFs, and 16 hours for transporters.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulation are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through the use of automated collection techniques, to the Director, Office of Policy, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.